

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AHMED ARFA, Individually And )  
On Behalf of All Others Similarly Situated, )  
Plaintiff, ) CIVIL ACTION NO. 10-cv-9053  
vs. )  
MECOX LANE LIMITED, NEIL NANPENG )  
SHEN, JOHN J. YING, PAUL BANG ZHANG, )  
ALFRED BEICHUN GU, KELVIN KENLING )  
YU, ANTHONY KAI YIU LO, DAVID JIAN )  
SUN, UBS AG, and CREDIT SUISSE )  
SECURITIES (USA) LLC, )  
Defendants. )  
\_\_\_\_\_  
)

WALTER P. BRADY, Individually And )  
On Behalf of All Others Similarly Situated, )  
Plaintiff, ) CIVIL ACTION NO. 11-cv-0034  
vs. )  
MECOX LANE LIMITED, NEIL NANPENG )  
SHEN, JOHN J. YING, PAUL BANG ZHANG, )  
ALFRED BEICHUN GU, KELVIN KENLING )  
YU, ANTHONY KAI YIU LO, DAVID JIAN )  
SUN, UBS AG, CREDIT SUISSE )  
SECURITIES (USA) LLC, OPPENHEIMER & )  
CO. INC. and ROTH CAPITAL PARTNERS, )  
LLC, )  
Defendants. )  
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**DECLARATION OF KIM E. MILLER IN SUPPORT OF THE MOTION OF WESTEND TO CONSOLIDATE RELATED ACTIONS; TO APPOINT LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD PLAINTIFF'S CHOICE OF COUNSEL**

I, Kim E. Miller, hereby declare as follows:

1. I am a member in good standing of the bar of New York, and a member of the law firm of Kahn Swick & Foti, LLC, proposed Lead Counsel for Movant, Westend Group (comprised of Westend Partners, L.P. and the Cooper Family Trust). I submit this declaration in support of the motion filed by Westend to: (1) consolidate all future related cases; (2) to be appointed as Lead Plaintiff; and (3) to approve Proposed Lead Plaintiff's selection of Co-Lead Counsel for the Class.

2. Attached as exhibits are true and correct copies of the following:

Exhibit A: Certification of the Westend Group (comprised of Westend Partners, L.P. and the Cooper Family Trust) along with a detailed listing of transactions in Mecox Lane Limited common stock during the Class Period.

Exhibit B: Published Notice on *Business Wire* on December 3, 2010, of the first securities class action complaint filed, in this matter, in the United States District Court for the Southern District of New York.

Exhibit C: Firm Biography for Proposed Co-Lead Counsel, Kahn Swick & Foti, LLC.

Exhibit D: Firm Biography for Proposed Co-Lead Counsel, Pomerantz Haudek Grossman & Gross, LLP.

I declare under penalty of perjury under the laws of the state of New York that the foregoing facts are true and correct.

Executed this 1<sup>st</sup> day of February, 2011, at New York, New York.

/s/ Kim E. Miller  
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KIM E. MILLER